# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

ROBERT CONNORS, ALEX EINSPRUCH	I,§	
KAYVON SHAHBAZ, BRIAN STEELY,	§	
AND PETER LU,	§	
	§	
PLAINTIFFS,	§	
	§	
V.	§	CIVIL ACTION NO. 3:17-CV-1066-G
	§	
TRAVELERS CASUALTY AND	§	
SURETY COMPANY OF AMERICA,	§	
	§	
DEFENDANT.	§	

## **JOINT STIPULATION OF DISMISSAL**

COME NOW, Plaintiffs Robert Connors, Alex Einspruch, Kayvon Shahbaz, Brian Steely, and Peter Lu ("Plaintiffs") and Defendant Travelers Casualty and Surety Company of America ("Defendant") (collectively, the "Parties"), and pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, hereby stipulate and agree as follows:

- (1) The Parties have reached a compromise settlement which resolves all claims which are in dispute among them in this action;
- (2) All claims or matters which were asserted or could have been asserted among the Parties in this action should be dismissed <u>with prejudice</u>.
  - (3) Each of the Parties should bear its own fees and costs.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court enter the proposed Order dismissing this action in accordance with the terms of this Stipulation.

### Respectfully submitted,

By: /s/ Shannon W. Conway

Shannon W. Conway State Bar No. 24052047

sconway@talcottfranklin.com

Cory C. Johnson

State Bar No. 24046162

cory@talcottfranklin.com

TALCOTT FRANKLIN P.C.

1920 McKinney Ave., 7th Floor

Dallas, Texas 75201

Telephone: (214) 736-8730

Fax: (800) 727-0659

### **ATTORNEYS FOR PLAINTIFFS**

—AND—

By: <u>/s/Ashley F. Gilmore</u>

J. Price Collins

State Bar No. 04610700

price.collins@wilsonelser.com

Ashley F. Gilmore

State Bar No. 50511704

ashley.gilmore@wilsonelser.com

WILSON ELSER MOSKOWITZ

EDELMAN & DICKER LLP

901 Main Street, Suite 4800

Dallas, Texas 75202-3758

Telephone: (214) 698-8000

Fax: (214) 698-1101

ATTORNEYS FOR DEFENDANT

#### **CERTIFICATE OF SERVICE**

This hereby certifies that a true and correct copy of the foregoing Joint Stipulation of Dismissal was served on all known counsel of record via the Court's CM/ECF system on October 31, 2017.

/s/ Ashley F. Gilmore
Ashley F. Gilmore